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7 Attorneys for Plaintiff VENTURA MACIAS

8
9 **UNITED STATES DISTRICT COURT**
10 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

11 VENTURA MACIAS, an Individual,

12
13 Plaintiff,

14 v.

15 LIBERTY LIFT SOLUTIONS, LLC, a
Delaware Limited Liability Company; and
16 DOES 1 through 20, inclusive,

17 Defendants.
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Case No.: 1:21-CV-00371-AWI-JLT

**STIPULATION AND [PROPOSED]
ORDER CONTINUING DEADLINE TO
FILE STIPULATION TO DISMISS
ACTION**

(Doc. 9)

1 Plaintiff VENTURA MACIAS (“Plaintiff”) and Defendant LIBERTY LIFT SOLUTIONS,
2 LLC (“Defendant”) hereby submit this Joint Stipulation and [Proposed] Continuing Deadline to
3 File Stipulation to Dismiss Action:

4 WHEREAS, Plaintiff and Defendant (the “Parties”) reached a settlement during mediation on
5 September 14, 2021;

6 WHEREAS, on September 21, 2021, the Court approved the Joint Stipulation and
7 [Proposed] Order to Continue Mandatory Scheduling Conference entered by and between Plaintiff
8 and Defendant (the “Parties”) and set a December 1, 2021, deadline for the Parties to file a
9 stipulation to dismiss action;

10 WHEREAS, since September 16, 2021, the Parties have been negotiating the terms of the
11 longform settlement agreement and still working on it;

12 WHEREAS, the Parties anticipate that the longform agreement will be finalized within the
13 next couple of weeks and will need another 30 days thereafter to fulfill the Parties’ obligations
14 under the settlement agreement;

15 WHEREAS, in light of the Parties’ agreement to settle this case, good cause exists to continue the
16 deadline to file a stipulation to dismiss action by 60 days to January 24, 2022.

17 NOW THEREFORE, the Parties hereby stipulate and agree to continue the deadline to file
18 a stipulation to dismiss action set for December 1, 2021, by 60 days to January 24, 2022.

19 Dated: **JOSEPH FARZAM LAW FIRM**

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21 _____
22 Joseph S. Farzam
23 Henna H. Choi
24 Attorneys for Plaintiff Ventura Macias

25 Dated:

26 _____
27 IRENE V. FITZGERALD
28 JULIE R. CAMPOS
LITTLER MENDELSON, P.C.
Attorneys for Defendant
LIBERTY LIFT SOLUTIONS, LLC

[PROPOSED] ORDER

On the stipulation of the Parties, and good cause appearing therefor, IT IS ORDERED
that:

The stipulation to dismiss the action shall be filed no later than January 24, 2022.

IT IS SO ORDERED.

Dated: November 29, 2021

/s/ Jennifer L. Thurston
CHIEF UNITED STATES MAGISTRATE JUDGE